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November 27, 2000

By Hand

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Petition for Arbitration of the Interconnection Agreement Between AT&T
Communications of the South Central States, Inc., TCG MidSouth, Inc. and BellSouth
Telecommunications, Inc.) Pursuant to the 47 U.S.C. § 252


Docket No. 00-00079

Dear Mr. Waddell:

Enclosed for filing in the above-captioned proceeding are an original and thirteen copies of
AT&T's First Set of Interrogatories and Request for Production of Documents to BellSouth
Telecommunications, Inc. A copy is being provided to counsel for BellSouth by courier and
electronic mail.

If you have questions, please call me.

Sincerely,


Jim Lamoureux

Encls.

POSTED
11-29-00

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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10/27 PM 1:45
BY: [illegible]

IN RE:

Petition for Arbitration of the)	
Interconnection Agreement Between)	
AT&T Communications of the South)	Docket No. 00-00079
Central States, Inc., TCG MidSouth, Inc.,)	
and BellSouth Telecommunications, Inc.)	
Pursuant to the 47 U.S.C. § 252)	
)	

**AT&T'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T"), pursuant to the Tennessee Regulatory Authority's Notice of Procedural Schedule issued in this docket on October 27, 2000, hereby serves its First Set of Interrogatories and Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth"). According to the Procedural Schedule, BellSouth may file Objections to this discovery no later than December 1, 2000, and shall provide Responses by December 8, 2000.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

4. "Cost Study" or "Cost Studies" includes study summaries, work papers, study inputs and supporting documentation.

5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

7. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

8. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information that would not otherwise not be brought within their scope.

10. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

12. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

13. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding

the authorization for each such disposition and
the date of such disposition.

14. "Identify," "identifying" or "identity" when used in reference to a communications means to state the date of the communications, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

GENERAL INSTRUCTIONS

1. If you contend that any response to any interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

INTERROGATORIES

1. Please list the docket number, FCC number, docket name and date released of any and all orders BellSouth relies upon to support the position that ISP traffic is subject to access charges. For each such order, list the paragraph number of the language relied upon.
2. Please list each and every activity BellSouth performs to convert special access services to UNE combinations.
3. Please list each and every FCC order, by docket number, docket name, date released and paragraph number relied upon to support BellSouth's position that IP telephony calls which are toll are governed by access charges.
4. Please list each and every Alternative Dispute Resolution proceeding BellSouth has participated in from 1996 forward. Include the state, CLEC name, name(s) of arbitrators, nature of dispute, whether dispute was based upon interconnection agreement (ICA), indicate whether ICA provided for ADR as the exclusive remedy for dispute resolution, date Complaint/Petition was filed to initiate ADR process, date of arbitration, date of ADR decision, whether or not outside counsel was used for ADR and a list of any and all costs associated with each ADR broken down by category and expense associated with the category.
5. Please identify the total number of tandem switches BellSouth plans to add in Tennessee in the next 2.5 years, the planned location of each such tandem switch, and describe the geographic area each new tandem switch will serve.
6. Please provide the number of existing trunks established between BellSouth's end office switches and compare it to the number of existing trunks between end offices switches and tandem switches in Tennessee. For the purpose of this request, BellSouth should exclude ancillary trunks such as E911, operator services and directory assistance trunks.

7. Please identify each local tandem switch in Tennessee by CLLI code and generic designation.
8. Please identify the BellSouth NPA-NXXs that subtend each respective BellSouth local tandem switch in Tennessee.
9. Please identify the BellSouth NPA-NXXs that are subsumed in each respective BellSouth local calling area in Tennessee.
10. Please provide the number of BellSouth customers who subscribe to LATA-wide calling plans in Tennessee and provide the percentage that this represents of the total BellSouth customers in Tennessee.
11. Please provide a detailed description of any and all steps entailed in performing the Connecting Facilities Assignment (“CFA”) Check.
12. Please describe in detail the time and manner in which BellSouth currently conducts its CFA check in the coordinated cutover process (i.e., during what step of the coordinated process does the CFA check occur and what is the relationship of the CFA check to the preceding and subsequent steps in the coordinated cutover process).
 - a) Do you agree that it is technically feasible to perform the CFA check prior to issuance of the FOC? If not, why not?
13. Please provide the average time duration for BellSouth to complete an electronic CFA check.
14. Please state with specificity how much it would cost to move the CFA check so that it is performed before the issuance of the FOC and provide a detailed analysis of the cost.
15. Please provide a detailed description of any and all steps entailed in performing the Loop Facilities Check.
16. Please describe in detail the time and manner in which BellSouth currently conducts its Loop Facilities Check in the coordinated cutover process (i.e., during what step of the coordinated process does the Loop Facilities Check occur and what is the relationship of the Loop Facilities Check to the preceding and subsequent steps in the coordinated cutover process).
 - a) Do you agree that it is technically feasible to perform the Loop Facilities Check prior to issuance of the FOC? If not, why not?
17. Please provide the average time duration for BellSouth to complete an electronic Loop Facilities check.

18. Please provide the costs necessary to move BellSouth's Loop Facilities check so that it is performed prior to the issuance of the FOC.
19. Please describe in detail any and all constraints or barriers that you assert would prohibit BellSouth from performing the CFA check and the Loop Facilities Check before issuing the FOC.
20. For the last three (3) months, please state the average length of time required to design a loop cut-over once BellSouth discovers that the loop being cut-over is currently provisioned over IDLC.
21. For the last three (3) months, please provide the number of BellSouth's loop cut-overs out of the total amount of coordinated cutovers performed for Tennessee that failed to be worked/cutover on the due date and/or due time stated on the original FOC due to BellSouth's Design problems.
 - a) Please describe in detail the nature of the failed cutover and why the due date and/or due time stated on the original FOC was due to BellSouth's design problems.
22. For the last three (3) months, please provide the number of BellSouth's loop cut-overs out of the total amount of coordinated cutovers performed for Tennessee that failed to be worked/cutover on the due date and or due time stated on the original FOC due to BellSouth's CFA mismatch with AT&T.
 - a) Were the failed cutovers referred in this Interrogatory due to BellSouth's facilities errors, BellSouth's manpower shortages or BellSouth's facility unavailability problems? If so, please provide a detailed explanation for BellSouth's facility errors and reasons for BellSouth's facilities to be unavailable.
23. Please provide the reasoning including, but not limited to discrepancies, troubles, and CFA errors in detail, for the BellSouth audit referred to in Mr. Milner's testimony in the AT&T/BellSouth Georgia Arbitration (Georgia Docket No. 11853-U) that revealed the necessity for a database synchronization between AT&T and BellSouth. Please provide the inputs Mr. Milner used in making his conclusions regarding the audit.
24. Please identify and describe in detail any and all resources, if any, including but not limited to personnel, equipment, and processing, that would be necessary to implement AT&T's request that BellSouth perform a CFA check and a loop-facilities check before the issuance of the FOC.
25. Please state whether BellSouth has a time frame for issuing clarifications, jeopardy notices, and rejections from the time of the receipt of the LSR. If yes, please provide the time frame(s) and a detailed explanation for these time frames.

26. Describe in detail the methodology utilized by BellSouth to calculate the “Percent Flow Through Service Requests Report” and “LNP Percent Flowthrough Service Requests Report” for service requests submitted on or after September 1, 2000, including a description of any changes to that methodology that have been implemented since that date. Include descriptions for all sub-sections of each report (Summary, Detail, Residence Detail, Business Detail, UNE Detail, Flowthrough Error Analysis, LNP Summary, and LNP Aggregate Detail).
27. List, identify and describe all products or services contained in BellSouth Flowthrough Reports under the following categories:
 - a) LNP;
 - b) UNE;
 - c) Business; and
 - d) Residence.
28. For each month beginning January 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify the volume of BellSouth employee input service requests that failed to be accepted by SOCS as valid service orders and thus did not reach assignable order (AO) status.

Month / Year
Service Requests for Local Exchange Service Failing to Reach AO Status

Product Group	Business	Residence	Total
Interface			
RNS			
DOE			
SONGS			
ROS			
Total			

29. Describe in detail the methods of access, and the functions and capabilities of “DLEC TAFI” announced to the CLEC community by Mr. Gene Piatkowski during the October 25, 2000 Change Control Process Monthly Status Meeting. Provide the scheduled dates when this interface will become operationally available to the CLECs.
30. Describe in detail the methods of access, and the functions and capabilities of “CPASS-TS” announced to the CLEC community by Mr. Gene Piatkowski during the October 25, 2000 Change Control Process Monthly Status Meeting. Provide the scheduled dates when this interface will become operationally available to the CLECs.

31. Describe in detail the methods of access, and the functions and capabilities of “E Repair” announced to the CLEC community by Mr. Gene Piatkowski during the October 25, 2000 Change Control Process Monthly Status Meeting. Provide the scheduled dates when this interface will become operationally available to the CLECs.
32. For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, provide the total number of CLEC trouble reports received by BellSouth by interface/process.

CLEC Trouble Volumes – Nine States

Month	TAFI	ECTA	WFA	LMOS	Total

CLEC Trouble Volumes – Tennessee

Month	TAFI	ECTA	WFA	LMOS	Total

33. For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, provide the total number of BellSouth retail trouble reports received by BellSouth by interface/process.

BellSouth Trouble Volumes – Nine States

Month	TAFI	WFA	LMOS	Total

BellSouth Trouble Volumes – Tennessee

Month	TAFI	WFA	LMOS	Total

34. Using the table below, for each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify
- a) the volume of CLEC local service requests (LSRs) received manually and via electronic interface, and the volume of service orders (SOs) subsequently issued.

Month / Year
Local Service Request* and Service Order Volume

Product	LNP	UNE	Business	Residence	Total
---------	-----	-----	----------	-----------	-------

Gro up										
	LSR	SO	LSR	SO	LSR	SO	LSR	SO	LSR	SO
Interface										
TAG										
EDI										
LENS										
Manual										
Total										

*Counted and reported at the individual LSR "version" level as is the practice in the BellSouth Flowthrough Report.

- b) the volume of LSRs submitted electronically that fall-out to manual handling and the volume of service orders ("SOs") that result.

Month / Year
Local Service Requests Routed for Manual Handling ("M" Orders)

Product Gro up	LNP		UNE		Business		Residence		Total	
	M	SO	M	SO	M	SO	M	SO	M	SO
Interface										
TAG										
EDI										
LENS										
Total										

- c) the volume of LSRs that fall out due to BellSouth errors ("BST Caused Fallout") and the volume of service orders (SOs) that result.

Month / Year
Local Service Requests Encountering BST Caused Fallout (BST Error)

Product Gro up	LNP		UNE		Business		Residence		Total	
	BST	SO	BST	SO	BST	SO	BST	SO	BST	SO

Interface										
TAG										
EDI										
LENS										
Total										

35. For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify the volume of BellSouth service requests for retail local exchange services and the volume of service orders (SOs) subsequently issued.

Month / Year
Service Requests for Local Exchange Service and Service Order Volume

Product Group	Business		Residence		Total	
	Requests	SO	Requests	SO	Requests	SO
Interface						
RNS						
DOE						
SONGS						
ROS						
Total						

36. For each month beginning May 2000 through October 2000, provide the number of BellSouth employees in the following “work centers” dedicated to the handling of CLEC transactions across all nine BellSouth states and for Tennessee specifically.

BellSouth Employees Dedicated to Handling CLEC Transactions		
Month / Year		
Local Carrier Service Center (LCSC)	Atlanta	Birmingham
Resale Group		
Complex Group		
UNE Group		
Project Group		
Total LCSC		

Unbundled Network Element Center (UNEC)		
Provisioning		
Maintenance		
Total UNCE		
BellSouth Resale Maintenance Center		
Local Interconnection Trunking Center		

37. For each month beginning May 2000 through October 2000, provide, by work center, the number of BellSouth employees in each of the BellSouth "work centers" analogous to the CLEC centers in Interrogatory 36, above, dedicated to handling BellSouth transactions across all nine BellSouth states and for Tennessee specifically.
38. Provide the average clearing time for retail troubles reported to BellSouth and handled/resolved using the TAFI system closed in TAFI using the front end close out process (FECO) and closed in LMOS for each month May 2000 through October 2000 inclusive.
39. Provide the average clearing time for retail troubles reported to BellSouth and handled and resolved using the LMOS.WFA system for each month May 2000 through October 2000 inclusive.
40. Provide the average "pickup" time from the time a repair service attendant or other Bellsouth employee directs a customer's trouble report to the LMOS/WFA system for distribution to a Maintenance Administrator until the time the report is actually viewed by the MA for each month May 2000 through October 2000 inclusive.
41. Please describe in detail the modifications that were required or made to the DOE and SONGS marketing and sales ordering systems to allow them to be used by BellSouth personnel in the LCSC to order unbundled network elements.
42. Please describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow Through Service Requests" for BellSouth's retail operations. Provide the methodology for requests placed using the Regional Negotiation System (RNS) and using the Regional Ordering System (ROS).
43. Please describe the reason for the delay in implementation of the enhancements to BellSouth's AIN SMS from June 14, 2000 until its anticipated offering in the fourth quarter 2000, as described on page 60 of Mr. Milner's Direct Testimony.

44. Mr. Milner testified in Docket 000649-TP (Tr. 1324), that no CLEC has yet chosen to implement the AIN Hubbing solution. Please state whether this is still true. If not, please provide the number of AIN customized routing arrangements solutions that have been provided to CLECs operating in Tennessee and in each other BellSouth state. For each state, please provide how many of each of these arrangements provide routing to a non-BellSouth OS/DA platform.
45. For each state in the BellSouth region, state the number of customized routing arrangements provided to CLECs using LCC technology, and state the number of these arrangements that provide routing to a non-BellSouth OS/DA platform?
46. Please list all telephone calls made to AT&T by or on behalf of any BellSouth personnel in connection with any hot cut made or attempted since August 15, 2000. For each such call, please state the following:
 - a) the date,
 - b) the person(s) who made the call,
 - c) the AT&T person(s) to whom the call was placed or who responded to the call,
 - d) the telephone number called,
 - e) the beginning and end time of the call, and
 - f) a description of the data or information provided to AT&T personnel during the call.
47. In the last five (5) years has there been any damage to BellSouth's equipment which was caused by AT&T employee or any other CLEC's employee who has access to a BellSouth Collocation site or other premises owned by BellSouth premises?
 - a) If so, for each such incident, please state the date, location, type of equipment damages, description of damages, and identity of the CLEC allegedly involved in the incident.
 - b) For each incident listed above, please also state whether such damage could have been prevented by the security background check proposed by BellSouth? If so, please describe in detail how such damage would have been prevented by this proposed security measure.
48. Please state the number of local calling areas BellSouth has in Tennessee.
49. Please state the name and location of each local calling area in Tennessee.
50. For each local calling area, please state the end offices by name and CILLI code.
51. For each local calling area, please provide the tandem switch that each endoffice in that local calling area subtends.

52. Please describe in detail BellSouth's proposal for arbitration issue no. 7, network interconnection. For each calling area, indicate where BellSouth would establish the Point of Interconnection and where it proposes AT&T pick up BellSouth originated traffic.
53. Since AT&T and BellSouth have reached agreement that all calls within each LATA will be treated as local for purposes of reciprocal compensation, please indicate if the Point of Interconnection will be different for any BellSouth originated calls that are not originated and terminated within the existing BellSouth local calling areas.
54. Please list, define, and explain the purposes and timing of all telephone calls made by BellSouth to AT&T during the hot cut process including, but not limited to the 24-48 hour call, the "good to go" call, and the cut complete call.
55. What is the origin of BellSouth's "good to go" call?
56. Does BellSouth consider the purpose of the "good to go" call to be the same as the 24-48 hour call? If so, why?

DOCUMENT REQUESTS

1. Please produce a copy of each and every tariff under which customers purchase services under volume and term arrangements that would include potential cancellation charges.
2. Please produce any and all documents relied upon to respond to AT&T's Interrogatory Number 4.
3. Please provide a map that identifies each BellSouth local calling area in Tennessee.
4. Please provide electronic copies of the diagrams (e.g. in PowerPoint, Word, or whatever program was used to create the diagrams) used by BellSouth witness Keith Milner in his summary during the AT&T/BellSouth Georgia Arbitration hearing (Georgia Docket No. 11853-U) to demonstrate how BellSouth proposes to connect its intermediary access terminals and to rebut the assertion of AT&T witness, Greg Beveridge, that the addition of such intermediary access terminals would create transmission impediments.
5. Please provide an electronic copy of Exhibits WKM-2 filed by BellSouth witness Keith Milner in his rebuttal testimony in the AT&T/BellSouth Georgia Arbitration proceeding (Georgia Docket No. 11853-U) on August 18, 2000.
6. Please provide electronic copies of the diagrams marked as BellSouth Exhibits 6 through 8 (e.g. in PowerPoint, Word, or whatever program was used to create the diagrams) used by Mr. Lackey in his cross-examination of AT&T witness Mr. Talbott during the AT&T/BellSouth Georgia Arbitration hearing (Georgia Docket No. 11853-U) with respect to the network architecture issue.

7. Please provide any and all documents that support, refer, relate, or pertain to your response to AT&T Interrogatory Request No. 14 concerning support for the costs of moving the CFA check out of provisioning and into the Ordering phase of the Hot Cut Process that would allow this check to occur prior to the issuance of the FOC.
8. Please provide any and all documents that support, refer, relate, or pertain to your response to AT&T Interrogatory Request No. 18 concerning the costs of moving the Loop-Facility check out of provisioning and into the Ordering phase of the Hot Cut Process that would allow this check to occur prior to the issuance of the FOC.
9. Please provide any and all documents that support, refer, relate, or pertain to your response to AT&T Interrogatory Request No. 21 concerning BellSouth's loop-cutovers that failed to be worked/cutover on the due date and or due time stated on the original FOC due to BellSouth's CFA problems.
10. Please provide any and all documents that support, refer, relate, or pertain to your response to AT&T Interrogatory Request No. 22 concerning BellSouth's loop-cutovers that failed to be worked/cutover on the due date and or due time stated on the original FOC due to BellSouth's Design Problems.
11. Please provide any and all documents that contain, refer, or relate to any and all data that involve performance of hot cuts in Tennessee with start and stop times of the cuts.
12. Please provide any and all documents that contain, refer, or relate to any and all data associated with the audit referred to by Mr. Milner at page 82, Volume 2 of the transcript in GPSC Docket No. 11853-U, concerning the synchronization of AT&T's and BellSouth's databases in his summary before the Georgia Public Service Commission, where in Mr. Milner stated as follows:

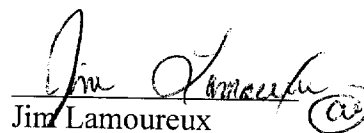
“AT&T has a database that should contain the same facilities information as BellSouth's database, however because we've had instances where AT&T assigned facilities that BellSouth's database showed as working, BellSouth conducted an audit and found that almost every mistake that occurred was because AT&T had not kept up its own database. That is, AT&T gave BellSouth a facility assignment that was wrong because AT&T had not kept its information in its database up to date. Requiring BellSouth to create a process to check its database before the check would normally be made, or even creating a process to allow AT&T to do such a check, simply because AT&T hasn't kept its database up to date just does not seem reasonable.”
13. Please provide a list of any and all personnel that perform the processing of hot cuts in the provisioning and design phases and their job duties as such.
14. On the attached spreadsheet titled “Data Collection Worksheet For Tennessee,” please provide any and all data, information, answers, and explanations requested in each

column for BellSouth's Tennessee Coordinated Conversions for the time period of September 11, 2000 through November 10, 2000.

15. Produce any and all documents, including, but not limited to, all reports, underlying work papers and guidelines that describe or from which one can calculate the percentage of orders for BellSouth's retail business customers that flowed through BellSouth's legacy systems, without human intervention, after input to ROS by a BellSouth employee for each month from May 2000 through October 2000 inclusive.
16. Produce copies of all documents that relate to the performance of LCSC operations, including, but not limited to, "LCSC Weekly Operations Reports" for the period May 2000 through October 2000 inclusive.
17. Produce copies of all documents that describe any problems with the interfaces offered to CLECs by BellSouth, any defects in those interfaces, malfunctions of those interfaces, or complaints by CLECs concerning BellSouth's interfaces, including, but not limited to, any problem logs for the period May 2000 through October 2000 inclusive.
18. Produce copies of all documents that describe, with specificity, what particular unbundled network elements, and what particular combinations of unbundled network elements, can be ordered by CLECs through each of BellSouth's interfaces.
19. Produce copies of all documents that relate to BellSouth's internal change control processes for its own internal OSS and for the CLEC OSS.
20. Please provide all documents that support, refer, relate, or pertain to concerning the development and deployment of DLEC TAFI and its equivalent interface used in BellSouth's operations, or your response to AT&T Interrogatory No. 29.
21. Please provide any and all documents that support, refer, relate, or pertain to the development and deployment of CPASS-TA and its equivalent interface used by BellSouth's access customers or your response to AT&T Interrogatory No. 30.
22. Please provide any and all documents that support, refer, relate, or pertain to the development and deployment of E-Repair and its equivalent interface used by BellSouth's large business retail customers or your response to AT&T Interrogatory No. 31.
23. Please provide any and all documents that support, refer, relate, or pertain to the modifications to DOE and SONGS to support UNE ordering, your response to AT&T Interrogatory No. 41.
24. Please provide all documentation associated with the end-to-end testing of BellSouth's enhancements to its AIN Service Management System (SMS) completed on June 14, 2000 as described on page 60 of Mr. Milner's Direct Testimony.
25. Please provide all documents that refer, relate to or support your response to AT&T Interrogatory No. 46.

26. Please provide all documents that refer, relate to or support your response to AT&T Interrogatory No. 47.

Respectfully filed this 27th day of November, 2000.

A handwritten signature in cursive script, appearing to read "Jim Lamoureux", with a circled "a" or similar mark at the end.

Jim Lamoureux
1200 Peachtree Street N.E.
Suite 8100, Room 8068
Atlanta, Georgia 30309
404-810-4196

Attorney for
AT&T COMMUNICATIONS OF
THE SOUTH CENTRAL STATES, INC.
and TCG MIDSOUTH, INC.

DATA COLLECTION WORKSHEET FOR GEORGIA PSC RECONCILIATION ORDER - Workcenter Job Aid

PON	VERSION NUMBER	NO. OF LOOPS	PRE-CONVERSION CALL RECEIVED	TIME STATED ON THE LSRC	SCHEDULED START DATE/TIME
<i>Description of Data Requested:</i>					
Purchase Order Number. There is no special requirement of the service agent.	What is the version number that this data represents? There is no special requirement of the service agent to populate data in the ASR log.	Number of Loops Included in Order. There is no special requirement of the service agent.	When (date and time) did AT&T receive the call from BellSouth to advise that BellSouth was ready to start the conversion of the customer's service? This is not the 24-48 hour confirmation call. This is the call just prior to the conversion. The service agent should populate this in the ASR log notes using the words, "AT&T RECEIVED THE PRE-CONVERSION CALL FROM (REP NAME) AT BELLSOUTH AT HOUR:MINUTE A/PM." The data gatherer should get this information from the ASR log notes.	What date and time was returned to AT&T from BellSouth in the DFDT field on the LSRC? This is most likely the BellSouth default time. There is no special requirement of the service agent.	What was the final agreed upon date and time that BellSouth was to have begun the conversion of the customer's service? AT&T requests a start date & time on the LSF BellSouth is sending back a default time on the LSRC. The AT&T service agent should assume that the time requested by AT&T is the scheduled start time unless BellSouth calls to negotiate a different time & AT&T agrees with the different time. <u>As a matter of policy, AT&T will accept BellSouth's request for a time change only if that request comes prior to the day of cut. AT&T will not accept a time change on the day of cut.</u> AT&T is not contacted by BellSouth to request a different time and/or a different time not negotiated, the LSR time stands & the service agent should not populate any additional conversion time data in ASR. The data gatherer should pull the time from LSR notes in Webcheck. The AT&T service agent should document all change requests in the ASR log notes, using the words, "(REP NAME) AT BELLSOUTH CALLED AT&T AT HOUR:MINUTES A/PM, TO NEGOTIATE A DIFFERENT CONVERSION TIME."

DIFFERENTLY NEGOTIATED START DATE/TIME	REASON FOR TIMELINESS MISS	DATE/TIME CLEC NOTIFIED CUT COMPLETE AND ACCEPTANCE TESTING OFFERED	REASON FOR DURATION MISS

What was the final negotiated date and time that BellSouth was to have begun the conversion of the customer's service? If the service agent is notified on the day of cut that a change is requested by BellSouth, the agent should respond, "IT IS NOT AT&T'S POLICY TO ACCEPT CONVERSION TIME CHANGES ON THE DAY OF CUT" and note this conversation in the log notes, using the words, "AT&T WAS CONTACTED BY (REP NAME) AT BELLSOUTH AT HOUR:MINUTE A/PM REQUESTING A CHANGE OF CONVERSION TIME. SINCE IT WAS ON THE DAY OF THE CONVERSION, AT&T WAS NOT ABLE TO HONOR THE REQUEST." If a different time is negotiated, the service agent should populate the newly negotiated time in the ASR log notes using the additional words, "THE NEW CONVERSION DATE AND TIME IS MONTH DATE, YEAR, AT HOUR:MINUTE A/PM." The data gatherer should retrieve the date and time from the ASR log notes.	If the Cut Start was delayed or started late, what was the reason for the delay? The service agent should populate notes in the ASR log that the cut was started late, the time the call was received to start the cut and the reason why the cut was started late, using the words, "BELLSOUTH STARTED THIS CUSTOMER'S CONVERSION LATE BECAUSE (REASON)." The data gatherer should retrieve the information from the ASR log notes.	On what date and at what time did AT&T receive a call from BellSouth to notify that the conversion was complete and ask AT&T to accept the circuit? The service agent should populate this information in the ASR log, using the words, "AT&T RECEIVED A CALL FROM (REP NAME) AT BELLSOUTH AT HOUR:MINUTE A/PM, NOTIFYING THAT THE CONVERSION OF THE CUSTOMER'S SERVICE WAS COMPLETE AND ASKING AT&T TO ACCEPT THE SERVICE." The data gatherer should retrieve this information from the ASR log.	If the duration of the conversion lasted longer than 15 minutes per loop (loop quantity as found in column b), what was the reason for the excessive duration? The service agent should record the duration of the cut in the ASR log notes, using the words, "THE CONVERSION OF THIS CUSTOMER'S SERVICE TOOK A TOTAL OF XXX MINUTES, WHICH IS XX MINUTES LONGER THAN STANDARD INTERVAL" and should record the reason for the excessive duration, using the words, "THE CONVERSION TOOK LONGER THAN 15 MINUTES PER LOOP BECAUSE (REASON)." The data gatherer should retrieve the information from the ASR log notes.
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DATA COLLECTION WORKSHEET FOR GEORGIA PSC RECONCILIATION ORDER - Workcenter Job Aid

PON	DATE/TIME ACCEPTANCE CONFLICT CALL RECEIVED FROM CLEC	REASON FOR ACCEPTANCE CONFLICT CALL (TROUBLES AT TIME OF PROVISIONING)	DATE/TIME OF ACCEPTANCE TESTING (CLEC RESPONDED)	TROUBLES RPT'D BY CLEC SAME DAY CUT COMPLETED	TROUBLES RPT'D BY CLEC BY NOON DAY AFTER CUT COMPLETED	TROUBLES RPT'D BY CLEC WIN 48 HRS. FOLLOWING CUT COMPLETION	DATE/ DISPOSITION OF TROUBLE REPORT	CIRCUIT ID
<i>Description of Data</i>								
Purchase Order Number. There is no special requirement of the service agent.	If there was a problem with the customer's service at the time of provisioning, on what date and at what time did AT&T call BellSouth to notify that there was a problem with the customer's service and notify BellSouth that AT&T would not accept the service? The service agent should record in the ASR log notes that such a call was made and on what date and at what time, using the words, "AT&T CALLED (REP NAME) AT BELLSOUTH AT HOUR:MINUTE A/PM, TO ADVISE OF A PROBLEM AND THAT AT&T WOULD NOT ACCEPT THE SERVICE CONVERSION." The data gatherer should retrieve the information from the ASR log notes.	What was the service problem with the customer's service at the time of conversion and prior to service acceptance? The service agent should record the reason in the ASR log notes, using the words, "THE CONVERSION WAS NOT ACCEPTED BECAUSE (REASON)." The data gatherer should retrieve the information from the ASR log notes.	On what date and at what time did AT&T call BellSouth to notify that AT&T accepted the service? This should be noted by the service agent in the ASR log notes, using the words, "AT&T CONTACTED (REP NAME OR REP'S NAME VOICE MAIL) AT BELLSOUTH AT HOUR:MINUTE A/PM, TO ACCEPT THE CUSTOMER'S SERVICE." The data gatherer should retrieve the information from the ASR log notes.	What troubles were reported by AT&T to BellSouth on this customer's service after acceptance, but on the same day as the service conversion? On what date and at what time? What is the trouble ticket number? The service agent should record this information in the ASR log notes, using the words, "AT HOUR:MINUTE A/PM, AT&T CALLED (REP NAME) AT BELLSOUTH TO INFORM BELLSOUTH OF TROUBLE WITH CUSTOMER'S SERVICE. THE REASON FOR THE TROUBLE WAS (STATE REASON). BELLSOUTH OPENED TROUBLE TICKET #XXXXXXX." The data gatherer should retrieve the information from the ASR log notes.	What troubles were reported by AT&T to BellSouth on this customer's service after acceptance, but by noon the day after the service conversion? On what date and at what time? What is the trouble ticket number? The service agent should record this information in the ASR log notes, using the words, "AT HOUR:MINUTE A/PM, AT&T CALLED (REP NAME) AT BELLSOUTH TO INFORM BELLSOUTH OF TROUBLE WITH CUSTOMER'S SERVICE. THE REASON FOR THE TROUBLE WAS (STATE REASON). BELLSOUTH OPENED TROUBLE TICKET #XXXXXXX." The data gatherer should retrieve the information from the ASR log notes.	What troubles were reported by AT&T to BellSouth on this customer's service after acceptance, but within 48 hours after the service conversion? On what date and at what time? What is the trouble ticket number? The service agent should record this information in the ASR log notes, using the words, "AT HOUR:MINUTE A/PM, (REP NAME) AT BELLSOUTH CALLED AT&T TO REPORT THE TROUBLE TICKET #XXXX CLEARED. (REP NAME) AT BELLSOUTH SAID THE REASON FOR THE TROUBLE WAS (REASON)." The data gatherer should retrieve the information from the ASR log.	On what date and at what time did BellSouth notify AT&T that the trouble was cleared? What was the reason for the trouble? The service agent should record the information in the ASR log notes, using the words, "AT HOUR:MINUTE A/PM, (REP NAME) AT BELLSOUTH CALLED AT&T TO REPORT THE TROUBLE TICKET #XXXX CLEARED. (REP NAME) AT BELLSOUTH SAID THE REASON FOR THE TROUBLE WAS (REASON)." The data gatherer should retrieve the information from the ASR log.	What is the BellSouth circuit id associated with this customer conversion? The service agent does not have to enter any additional information in the ASR log notes.